

Submission  
No 16

**INQUIRY INTO PREVENTION OF CRUELTY TO ANIMALS  
AMENDMENT (RESTRICTIONS ON STOCK ANIMAL  
PROCEDURES) BILL 2019**

**Organisation:** National Council of Wool Selling Brokers of Australia

**Date Received:** 31 July 2020

---



# The National Council of Wool Selling Brokers of Australia Inc

ABN 40 059 628 554

AWH Wool Selling Centre.

Gate 4, 29 Frederick Rd, Tottenham, Vic 3012 Australia

Phone: +61(0)419344259

e-mail: [info@ncwsba.org](mailto:info@ncwsba.org)



31 July 2020

NCWSBA-20-038

Portfolio Committee No. 4 - Industry  
Legislative Council  
NSW Parliament

By Email: [portfoliocommittee4@parliament.nsw.gov.au](mailto:portfoliocommittee4@parliament.nsw.gov.au)

## **Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019**

Thank you for the opportunity to provide a submission from the National Council of Wool Selling Brokers of Australia regarding the *Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019*. We were made aware of the NSW Legislative Council Committee review of the Bill from the media.

The National Council of Wool Selling Brokers of Australia is the only national organisation representing wool brokers on all issues that affect the Australian wool industry, with NCWSBA members accounting for around 80% of wool sold at auction in Australia. Wool brokers are representatives for Australian wool producers in selling wool for their clients, but also in providing a range of services, including ram selection, sheep classing, advice at shearing for clip preparation, wool quality and marketing, insurance and banking, farm supplies, market information and risk management services.

NCWSBA and our members are involved both at the policy level (internationally and in Australia) and at the farm level in ensuring that the Australian wool industry maintains the best possible animal welfare standards, including to meet the challenge of mulesing. NCWSBA is strongly committed to ensuring national consistency with regard to animal welfare and fully supports the Australian Animal Welfare Standards for Sheep.

In this regard, NCWSBA strongly opposes the proposed prohibition of mulesing as contained in the *Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019*. The proposed prohibition would cause significant animal welfare issues as it would greatly increase the likelihood of flystrike, which causes significant pain and suffering, and, in some cases, death. It is possible for some sheep to be struck more than once in their lifetime. The submission from the Australian Wool Growers' Association to the Committee review of the Amendment Bill provides an overview of the benefits of mulesing where it is needed.

A ban on mulesing in New South Wales would inevitably result in lower wool production in the state. This would have a major impact on the Australian and global wool industry. New South Wales is the largest wool producing state in Australia, accounting for 33% of Australia's shorn wool production, 7% of total world wool production and 13% of all wool used in clothing in the world. As Australia accounts for around 70% of world Merino wool production, a fall in wool

production in New South Wales would directly and significantly affect the volume of Merino wool available around the world. Merino wool is used in lightweight knitwear, suiting fabrics and the growing market of active leisurewear, and meets the growing consumer demand for natural, environmentally friendly textile fibre.

NCWSBA fully and strongly supports the mandatory use of an analgesic or anaesthetic administered pre- and/or post-operatively for surgical mulesing (the analgesic or anaesthetic must be registered for use on sheep). NCWSBA would therefore strongly support an amendment to Section 24 of the *Prevention of Cruelty to Animals Act 1979 No 200* which would require the use of an analgesic or other form of pain relief when performing mulesing. The currently-proposed Amendment Bill is silent on this issue, even in the period until 1 January 2022 when the Amendment is proposed to come into force.

The mandatory use of pain relief when mulesing has been achieved in Victoria in the *Prevention of Cruelty to Animals Regulations 2019* with the following clause [Part 2 – Protection of animals; Division 1 – General requirements; clause 8 Sheep (2)]

“A person must not mules a sheep unless the sheep is administered pain relief with a product that has been registered for use on sheep by the Australian Pesticides and Veterinary Medicines Authority.”

NCWSBA urges consistency between states on the requirement for the use of pain relief when mulesing and would like to see New South Wales adopt the same approach as Victoria to the use of pain relief when mulesing.

The significant majority, but not all, of NCWSBA member companies support the use of pain relief when tail docking (termed tailing in the *NSW Prevention of Cruelty to Animals Act 1979 No 200*) and castrating lambs. The Victorian Regulations do not address the issue of the use of pain relief when tail docking and castrating lambs. There is no support among NCWSBA member companies for the mandatory use of pain-relief when ear-tagging sheep.

If you would like to discuss our submission or require further information, could you please contact me by email at \_\_\_\_\_ or by phone on \_\_\_\_\_.

Yours sincerely,

Chris. Wilcox  
Executive Director

cc Board of NCWSBA.